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Group Long Term Disability Plan for  
Employees of Oracle America, Inc. and  
Hartford Life and Accident Insurance Company*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

DAVE NAGY,

Plaintiff,

v.

GROUP LONG TERM  
DISABILITY PLAN FOR  
EMPLOYEES OF ORACLE  
AMERICA, INC., and HARTFORD  
LIFE AND ACCIDENT  
INSURANCE COMPANY,

Defendants.

Case No. 14-CV-00038-HSG

**STIPULATION AND ORDER FOR  
EXTENSION TO SUBMIT A  
PROPOSED JUDGMENT RE  
DISABILITY BENEFITS AND  
PREJUDGMENT INTEREST**

Honorable Haywood S. Gilliam, Jr.

Plaintiff Dave Nagy (“Plaintiff” or “Nagy”) and Defendants Group Long  
Term Disability Plan for Employees of Oracle America, Inc. (“the Plan”) and  
Hartford Life and Accident Insurance Company (“Hartford”) (collectively

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1 “Defendants”), hereby stipulate for an extension of ten (10) days to submit a  
2 proposed judgment consistent with the Court’s April 22, 2016 Order.

3 WHEREAS on April 22, 2016 this Court issued an interlocutory order  
4 finding Nagy was entitled to disability benefits between September 13, 2011 and  
5 January 16, 2013.

6 WHEREAS this Court also ordered the parties to meet and confer over the  
7 amount of disability benefits and prejudgment interest owed to Nagy based on the  
8 findings and conclusions of the Court’s order and submit a proposed judgment  
9 within thirty (30) days.

10 WHEREAS, the parties have met and conferred over the disability benefits  
11 awarded under the Court’s order and have essentially reached an agreement on that  
12 amount. However, the parties have a disagreement over the amount of pre-  
13 judgment interest that should be awarded and thus jointly request that this Court  
14 allow a brief ten (10) day extension to submit the proposed judgment to see if they  
15 can resolve the interest issue.

16 THE PARTIES THEREFORE STIPULATE AND REQUEST that they be  
17 given a ten (10) day extension to submit the proposed judgment to the Court by no  
18 later than **June 2, 2016**.

19  
20 Dated: May 23, 2016

Law Offices of Laurence F. Padway

21  
22 By: /s/ Laurence F. Padway  
[As authorized on May 23, 2016]

23 Laurence F. Padway  
24 Attorneys for Plaintiff Dave Nagy  
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1 Dated: May 23, 2016

Burke, Williams & Sorensen, LLP


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3 By: /s/ Michael B. Bernacchi

4 Michael B. Bernacchi  
5 Attorneys for Defendants Group Long  
6 Term Disability Plan for Employees of  
7 Oracle America, Inc. and Hartford Life  
8 and Accident Insurance Company

9  
10 **ORDER**

11 Pursuant to the parties' stipulation, and good cause appearing, IT IS  
12 HEREBY ORDERED that the proposed judgment be filed with the Court no later  
13 than **June 2, 2016**.

14 Dated: 5/24/2016

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Hon. Haywood S. Gilliam, Jr.  
United States District Judge